



Chinle Service Unit  
Navajo Area Indian Health Service  
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Chinle, Arizona 86503  
928-674-7011

May 26, 2016

Thomas Betlach  
AHCCCS Director  
801 E. Jefferson St., MD-4100  
Phoenix, AZ 85034

**RE: *Comments from Chinle Service Unit Indian Health Service on the Tribal Section 1115 Waiver Workgroup recommendations on:***  
***1) American Indian Medical Home***  
***2) Traditional Healing Benefit, and***  
***3) Uncompensated Care Payments to IHS and Tribal 638 facilities***

Dear Director Betlach,

Chinle Service Unit IHS appreciates the opportunity to provide input into the Section 1115 Waiver and support the recommendations of the Tribal Section 1115 Workgroups.

We have the following suggestions on the American Indian Medical Home section:

We suggest that the goal be to have participating sites achieve PCMH recognition through a recognized accreditation body, but that they be allowed a 3 year grace period in which to accomplish that. We suggest that DSRIP be considered as option for paying for fees associated with PCMH recognition. We recommend the following changes:

Medical Home Program Mandatory Criteria:

IHMHP designation is achieved through two routes – Patient Centered Medical Home (PCMH) recognition through a recognized accreditation body or evidence that the site is actively pursuing PCMH recognition. The second route is limited to three consecutive years and is designed to support sites in implementing the system changes needed to achieve medical home recognition.

1. The site has achieved PCMH recognition through NCQA, Accreditation Association for Ambulatory Health Care, The Joint Commission PCMH Accreditation Program, or other appropriate accreditation body, *OR*
2. The site is actively pursuing PCMH recognition as evidenced by annual IHS IPC attestation that the site completed the following activities in the past year:
  - a. Submitted the SNMHI Patient-Centered Medical Home Assessment (PCMH-A) to IHS IPC;
  - b. Submitted monthly data on the IPC Core Measures to the IPC Data Portal;  
*AND*
  - c. Submitted narrative summaries on IPCMH improvement projects to IHS IPC quarterly.

We have some concerns about including the Diabetes Education part in the medical home waiver section. As written, the section doesn't describe how AHCCCS will determine if a site provides the recommended components. It could be structured in a similar way to the PCMH part since

sites can achieve Diabetes Education Accreditation through AADE. We recommend the following changes to the section on diabetes education:

Diabetes Education Mandatory Criteria:

National standards for diabetes self-management education and support are defined by the American Association of Diabetes Educators (AADE). These standards address program organization, stakeholder input, program planning and coordination, staff qualifications, curriculum, and quality assurance and improvement. Medicare reimburses diabetes education services Diabetes Education Accreditation through the American Association of Diabetes Educators (AADE). To qualify for the additional PMPM for diabetes education, IHMHPs must have Diabetes Education Accreditation through a recognized accreditation agency.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron Tso', with a stylized flourish at the end.

Ron Tso, MPH  
Chief Executive Officer  
Chinle Service Unit